

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, STANDARD CHARTERED BANK,
STANDARD CHARTERED PLC, STANDARD
CHARTERED BANK (PAKISTAN) LIMITED,
DANSKE BANK A/S, DANSKE MARKETS INC.,
PLACID NK CORPORATION d/b/a PLACID
EXPRESS, and WALL STREET EXCHANGE LLC,

Defendants.

21 Civ. 4400 (KAM) (RML)

DECLARATION OF BRIAN T. FRAWLEY

BRIAN T. FRAWLEY hereby declares under penalty of perjury as follows:

1. I am a member of the law firm of Sullivan & Cromwell LLP, counsel for Defendants Danske Bank A/S and Danske Markets Inc. (the “Danske Defendants”) in this action, and a member of the Bar of this Court. I make this Declaration in support of the Danske Defendants’ Motion to Dismiss the Amended Complaint.

2. Attached hereto as Exhibit 1 is a chart, prepared at my direction, that lists, in ascending chronological order, each of the alleged terrorist attacks identified in paragraphs 1101 through 2024 of the Amended Complaint, including the date and description of the alleged attacks, as well as the organization alleged to be responsible for the alleged terrorist attacks.

3. Attached hereto as Exhibit 2 is the transcript from the December 7, 2021 pre-motion conference held in this matter before the Honorable Kiyo A. Matsumoto.

4. Attached hereto as Exhibit 3 is a true and correct copy of the article printed by Italian news *Corriere Della Sera*, which plaintiffs cite in paragraph 553 of the Amended Complaint.

5. Attached hereto as Exhibit 4 is a true and correct copy of the article printed by German news *Süddeutsche Zeitung*, which plaintiffs cite in paragraph 540, note 351 of the Amended Complaint.

6. Attached hereto as Exhibit 5 is a true and correct copy of the article printed by *Business Recorder*, which plaintiffs cite in paragraph 541, note 352 of the Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 18, 2022

/s/ Brian T. Frawley
Brian T. Frawley